

GREGORY G. KATSAS
Acting Assistant Attorney General
DAVID J. KLINE
Director, District Court Section
Office of Immigration Litigation
VICTOR M. LAWRENCE, DCBN 449052
Principal Assistant Director
CHRISTOPHER W. HOLLIS, ILBN 6283101
Trial Attorney

P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 305-0899; FAX: (202) 616-8962

Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NOORULLAH KHAN

Plaintiff,

v.

JONATHAN SCHARFEN,
Acting Director, United States Citizenship
and Immigration Services,

Defendant.

No. 08-cv-1679 (MMC)

**STIPULATION TO EXTEND
DATES; AND ORDER**

Date: July 11, 2008
Time: 9:00 a.m.
Courtroom: 7, 19th Floor

Plaintiff, by and through his attorney of record, and Defendant, by and through his attorney of record, hereby stipulate, subject to the approval of the Court, to the following:

1. Plaintiff filed this action on or about March 27, 2008, and Defendant was served on or about this date.

2. Pursuant to this Court's Order Setting Initial Case Management Conference and ADR Deadlines, dated March 27, 2008, the parties were required to file a joint case management statement on July 7, 2008, and are required to attend a case management conference on July 11, 2008.

3. On May 27, 2008, Defendant filed a motion to dismiss and noticed a hearing for July 11, 2008.

STIPULATION TO EXTEND DATES;
AND [PROPOSED] ORDER, 08-CV-1679 (MMC)

1 4. On June 3, 2008, Plaintiff filed his opposition to Defendant's motion to dismiss and
2 cross-motined for leave to file an amended complaint.

3 5. Defendant's reply supporting the motion to dismiss is due no later than June 27, 2008.

4 7. The parties agree that good cause exists for granting an extension of the dates on
5 which the case management statement and case management conferences are currently scheduled
6 since the Court's determination on Defendant's motion to dismiss will either moot out the issue
7 in its entirety or significantly change the nature of the arguments to be considered by the Court.

8 8. The parties hereby respectfully ask this Court to extend the dates in the Court's
9 scheduling order as follows:

10 Last day to file/serve Joint Case Management Statement: August 8, 2008

11 Case Management Conference: August 15, 2008 at 10:30 a.m.

12 Dated: June 12, 2008

13 Respectfully submitted,

14 GREGORY G. KATSAS
15 Acting Assistant Attorney General
16 DAVID J. KLINE
17 Director, District Court Section
18 VICTOR M. LAWRENCE
19 Principal Assistant Director

20 By: /s/
21 CHRISTOPHER W. HOLLIS
22 Trial Attorney
23 Office of Immigration Litigation
24 U.S. Department of Justice
25 P.O. Box 868, Ben Franklin Station
26 Washington, D.C. 20044
27 (202) 305-0899; 616-8962 (FAX)
28 christopher.hollis@usdoj.gov
Attorneys for Defendant

23 Dated: June 12, 2008

24 /s/
25 JONATHAN M. KAUFMAN
26 Attorney for Plaintiff

ORDER

Pursuant to stipulation, IT IS SO ORDERED, with the exception that the Case Management Conference is continued to August 29, 2008 at 10:30 a.m., and last day to file/serve the Joint Case Management Statement is continued to August 22, 2008.

Dated this 13th day of June, 2008


MAXINE M. CHESNEY
United States District Judge